

ELECTRONIC FRONTIER FOUNDATION, ) Case No. 10-CV-4892-RS  
)  
Plaintiff, )  
)  
vs. ) **STIPULATED REQUEST FOR ORDER**  
) **TO CONTINUE ALL REMAINING**  
) **DATES IN BRIEFING SCHEDULE**  
) **FOR PARTIES' CROSS-MOTIONS**  
) **FOR SUMMARY JUDGMENT BY**  
DEPARTMENT OF JUSTICE, ) **TWO WEEKS**  
)  
)  
Defendant. ) [CIV. L.R. 6-2]

10-CV-  
4892-RS

## STIPULATION

1 Defendant files an Opposition to Plaintiff's Cross-Motion  
2 for Summary Judgment and Reply in support of  
its Motion for Summary Judgment

April 26, 2012

3 Plaintiff files a Reply in support of its  
4 Cross-Motion for Summary Judgment

May 17, 2010

5 Hearing on cross motions.

May 31, 2012

6  
7 The requested changed will minimally affect the present schedule for the case because it  
8 proposes continuing all dates, including the hearing date on the parties' cross motions for summary  
9 judgment, by two weeks. In accordance with Civil L.R. 6-2(a), this stipulation is supported by the  
10 Declaration of Nicholas Cartier, counsel for Defendant.

11 The parties have previously stipulated to a briefing schedule (ECF No. 28) and to three  
12 adjustments to that briefing schedule, two to accommodate the Defendant (ECF Nos. 32 and 36)  
13 and the other to accommodate the Plaintiff (Dkt. 34). Defendant seeks the current two-week  
14 extension to allow its three components (Criminal Division, DEA and FBI) to complete work on  
15 supplemental declarations to address arguments raised in Plaintiff's Cross-Motion and Opposition.  
16 In addition, FBI requires this additional time to make corrections to the annotations on some of the  
17 pages it produced to Plaintiff, which do not clearly indicate what exemption has been invoked with  
18 respect to certain redactions on the pages.  
19

20 The parties respectfully request that the schedule above be adopted in place of the schedule  
21 previously proposed.  
22

23 DATED: April 10, 2012

/s/ Nicholas Cartier  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 10, 2012, I caused a copy of the foregoing to be served on Plaintiff via the Court's ECF system.

/s/ Nicholas Cartier  
NICHOLAS CARTIER


**GENERAL ORDER NO. 45(X) CERTIFICATION**

I attest that I have obtained the concurrence of Jennifer Lynch, counsel for Plaintiff, in the filing of this document.

/s/ Nicholas Cartier  
NICHOLAS CARTIER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 4/10/12

  
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Hon. Richard Seeborg  
United States District Judge